

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : CRIMINAL NO. \_\_\_\_\_  
v. : DATE FILED: \_\_\_\_\_  
ALBERT TRIBUNO : VIOLATION: 18 U.S.C. § 1343  
(Wire fraud – 1 count)

I N F O R M A T I O N

C O U N T 1

THE UNITED STATES ATTORNEY CHARGES THAT:

At all times material to this Information:

1. Defendant ALBERT TRIBUNO was the controller of Scott Technologies, Inc. and a joint venture controlled by Scott Technologies (collectively, “Scott Technologies”), a wholly-owned subsidiary of Tyco International, Ltd.

2. Scott Technologies, located at 251 Welsh Pool Road, Exton, Pennsylvania, was a leading designer and manufacturer of sophisticated, high-performance respiratory systems and other life saving equipment for aerospace, aviation, defense, firefighting, government, and industrial markets.

\_\_\_\_\_3. Scott Technologies issued several corporate credit cards to defendant ALBERT TRIBUNO, including Dollar Bank (VISA), American Express, and Mellon Bank cards. The Mellon Bank credit card was serviced in, among other places, Wilmington, Delaware.

4. Scott Technologies held a demand deposit account at Mellon Bank, Pittsburgh, Pennsylvania.

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The Scheme To Defraud

5. From in or about June 1999, to in or about December 2002, defendant

ALBERT TRIBUNO

devised and intended to devise a scheme to defraud Scott Technologies, and obtain money and property from Scott Technologies by means of false and fraudulent pretenses, representations, and promises.

Manner and Means of Executing the Scheme

It was part of the scheme that:

6. Defendant ALBERT TRIBUNO used blank checks belonging to Scott Technologies to pay off approximately one quarter of a million dollars in personal credit card debt.

7. Defendant ALBERT TRIBUNO used three different corporate credit cards – the Dollar Bank (VISA), American Express, and Mellon Bank cards – to pay personal expenses (including cash advances) not authorized by Scott Technologies.

8. Defendant ALBERT TRIBUNO submitted to Scott Technologies expense reports for expenses having no valid business purpose and was reimbursed by Scott Technologies for those expenses.

9. As a result of the scheme to defraud, defendant ALBERT TRIBUNO caused a loss to Scott Technologies of approximately \$321,917.

10. On or about July 30, 2002, at Exton, in the Eastern District of Pennsylvania, and elsewhere, defendant

ALBERT TRIBUNO,

for the purpose of executing the scheme, caused to be transmitted by means of wire communication in interstate commerce signs, signals, and sounds of an electronic transfer of funds from Scott Technologies' demand deposit account at Mellon Bank in Pittsburgh, Pennsylvania, to Mellon Bank's Corporate Card Services, in Wilmington, Delaware, that is, an electronic transfer of \$31,863.95, which amount included \$1,043.64 in payment for cash advances of TRIBUNO that were not authorized by Scott Technologies.

In violation of Title 18, United States Code, Section 1343.

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PATRICK L. MEEHAN  
United States Attorney